

# Exhibit D

**In the Matter Of:**  
**CITY OF DETROIT, MICHIGAN**

Case No. 13-53846

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**CHARLES M. MOORE**

*September 18, 2013*

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IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re Chapter 9  
CITY OF DETROIT, MICHIGAN, Case No. 13-53846  
Debtor. Hon. Steven W. Rhodes

DEPONENT: CHARLES M. MOORE

DATE: Wednesday, September 18, 2013

TIME: 10:02 a.m.

LOCATION: MILLER CANFIELD PADDOCK & STONE PLC  
150 West Jefferson, Suite 2500  
Detroit, Michigan

REPORTER: Jeanette M. Fallon, CRR/RMR/CSR-3267



1 would be -- that in the City's view must occur;  
2 correct?

3 A. Correct.

4 Q. Has there been a specification of those level of cuts  
5 that the City contends must occur?

6 MR. MILLER: Object to form.

7 Q. I mean, have you put a dollar amount on it?

8 A. No, and our analysis of this continues. Right now we  
9 still don't know what assets could be available to put  
10 towards the pensions. We still have not had the type  
11 of dialogue that we would like to have related to the  
12 calculation of the unfunded amount, so because of  
13 those two uncertainties among others we don't know  
14 what cuts, if any, there may need to be.

15 Q. Well, doesn't it say there must be significant cuts?  
16 Am I -- are you saying that there's some -- that the  
17 City's position may be that there are no cuts that are  
18 necessary in accrued vested pension amounts?

19 MR. MILLER: Object to form.

20 A. We don't know. That's where we want to continue to  
21 engage in discussions and negotiations with the  
22 parties, but depending on what the unfunded amount is  
23 and what assets may be available for those claims, it  
24 certainly is possible.

25 Q. So maybe that should have been worded there may be



1 State of Michigan)

2 County of Genesee)

3 Certificate of Notary Public

4 I certify that this transcript is a complete, true and  
5 correct record of the testimony of the witness held in this  
6 case.

7 I also certify that prior to taking this deposition,  
8 the witness was duly sworn or affirmed to tell the truth.

9 I further certify that I am not a relative or an  
10 employee of or an attorney for a party; and that I am not  
11 financially interested, directly or indirectly, in the  
12 matter.

13 WITNESS my hand this 20th day of September,  
14 2013.

15  
16  
17 

18 Jeanette M. Fallon, CRR/RMR/CLR/CSR-3267

19 Certified Realtime Reporter

20 Registered Merit Reporter

21 Certified LiveNote Reporter

22 Certified Shorthand Reporter

23 Notary Public, Genesee, Michigan

24 Acting in Oakland County, Michigan

25 My Commission Expires: 9-19-18



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